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RIVERSIDE, SHERIFF CHAD BIANCO,
EDWARD DELGADO, JAMES
KRACHMER, and DAVID HOLM

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ESTATE OF RICHARD MATUS, JR.,
by and through successors in interest,
G.M., R.M., and Lisa Matus; G.J., a
minor, by and through Guardian Ad
Litem, Lisa Matus; R.M., a minor, by
and through Guardian Ad Litem, Lisa
Matus; LISA MATUS, individually,,

Plaintiffs,

vs.

COUNTY OF RIVERSIDE, a public
entity; RIVERSIDE COUNTY
SHERIFF'S DEPARTMENT;
SHERIFF CHAD BIANCO, in his
individual and official capacities;
EDWARD DELGADO; JAMES
KRACHMER; DAVID HOLM; and
DOES 1 through 10, individually,
jointly and severally, ,

Defendants.

Case No. 5:23-cv-00506-MEMF-SP

**ANSWER OF DEFENDANTS TO
PLAINTIFFS' COMPLAINT FOR
DAMAGES: JURY TRIAL
DEMANDED**

FSC Date: None Set

Trial Date: None Set

Defendants COUNTY OF RIVERSIDE ("County"), SHERIFF CHAD
BIANCO, EDWARD DELGADO, JAMES KRACHMER, AND DAVID HOLM
(collectively "Defendants") hereby answer Plaintiffs' First Amended Complaint for
Damages (Doc. 19; hereinafter referred to as the "Complaint") and Defendants

1 hereby admit, deny, and allege as follows:

2 **ANSWER TO COMPLAINT**

3 1. Answering paragraph 1 of the Complaint, under the header
4 “Introduction”: Defendants do not have sufficient knowledge, or information or
5 belief, to enable Defendants to answer the allegations contained within such
6 paragraph, as stated, and on those grounds deny generally and specifically each and
7 every of the allegations contained therein – and Defendants deny all liability and/or
8 wrongdoing.

9 2. Answering paragraph 2 of the Complaint, under the header
10 “Introduction”: Defendants do not have sufficient knowledge, or information or
11 belief, to enable Defendants to answer the allegations contained within such
12 paragraph, as stated, and on those grounds deny generally and specifically each and
13 every of the allegations contained therein – and Defendants deny all liability and/or
14 wrongdoing.

15 3. Answering paragraph 3 of the Complaint, under the header
16 “Introduction”: Defendants do not have sufficient knowledge, or information or
17 belief, to enable Defendants to answer the allegations contained within such
18 paragraph, as stated, and on those grounds deny generally and specifically each and
19 every of the allegations contained therein – and Defendants deny all liability and/or
20 wrongdoing.

21 4. Answering paragraph 4 of the Complaint, under the header
22 “Introduction”: Defendants do not have sufficient knowledge, or information or
23 belief, to enable Defendants to answer the allegations contained within such
24 paragraph, as stated, and on those grounds deny generally and specifically each and
25 every of the allegations contained therein – and Defendants deny all liability and/or
26 wrongdoing.

27 5. Answering paragraph 5 of the Complaint, under the header
28 “Introduction”: Defendants do not have sufficient knowledge, or information or

1 belief, to enable Defendants to answer the allegations contained within such
 2 paragraph, as stated, and on those grounds deny generally and specifically each and
 3 every of the allegations contained therein – and Defendants deny all liability and/or
 4 wrongdoing.

5 6. Answering paragraph 6 of the Complaint, under the header
 6 “Introduction”: Defendants do not have sufficient knowledge, or information or
 7 belief, to enable Defendants to answer the allegations contained within such
 8 paragraph, as stated, and on those grounds deny generally and specifically each and
 9 every of the allegations contained therein – and Defendants deny all liability and/or
 10 wrongdoing.

11 7. Answering paragraph 7 of the Complaint, under the header
 12 “Jurisdiction and Venue”: Defendants admit that jurisdiction is conferred upon this
 13 Court by 28 U.S.C. §§ 1331. As to the remaining allegations in this paragraph,
 14 Defendants do not have sufficient knowledge, or information or belief, to enable
 15 Defendants to answer the allegations contained within such paragraph, as stated, and
 16 on those grounds deny generally and specifically each and every of the allegations
 17 contained therein – and Defendants deny all liability and/or wrongdoing.

18 8. Answering paragraph 8 of the Complaint, under the header
 19 “Jurisdiction and Venue”: Defendants do not have sufficient knowledge, or
 20 information or belief, to enable Defendants to answer the allegations contained
 21 within such paragraph, as stated, and on those grounds deny generally and
 22 specifically each and every of the allegations contained therein – and Defendants
 23 deny all liability and/or wrongdoing.

24 9. Answering paragraph 9 of the Complaint, under the header
 25 “Jurisdiction and Venue”: Defendants admit that venue is proper under 28 U.S.C. §
 26 1391(b). As to the remaining allegations in this paragraph, Defendants do not have
 27 sufficient knowledge, or information or belief, to enable Defendants to answer the
 28 allegations contained within such paragraph, as stated, and on those grounds deny

1 generally and specifically each and every of the allegations contained therein – and
 2 Defendants deny all liability and/or wrongdoing.

3 10. Answering paragraph 10 of the Complaint, under the header “Pendant
 4 Claims”: Defendants do not have sufficient knowledge, or information or belief, to
 5 enable Defendants to answer the allegations contained within such paragraph, as
 6 stated, and on those grounds deny generally and specifically each and every of the
 7 allegations contained therein – and Defendants deny all liability and/or wrongdoing.

8 11. Answering paragraph 11 of the Complaint, under the header “Pendant
 9 Claims”: Defendants do not have sufficient knowledge, or information or belief, to
 10 enable Defendants to answer the allegations contained within such paragraph, as
 11 stated, and on those grounds deny generally and specifically each and every of the
 12 allegations contained therein – and Defendants deny all liability and/or wrongdoing.

13 12. Answering paragraph 12 of the Complaint, under the header “Parties”:
 14 Defendants do not have sufficient knowledge, or information or belief, to enable
 15 Defendants to answer the allegations contained within such paragraph, as stated, and
 16 on those grounds deny generally and specifically each and every of the allegations
 17 contained therein – and Defendants deny all liability and/or wrongdoing.

18 13. Answering paragraph 13 of the Complaint, under the header “Parties”:
 19 Defendants do not have sufficient knowledge, or information or belief, to enable
 20 Defendants to answer the allegations contained within such paragraph, as stated, and
 21 on those grounds deny generally and specifically each and every of the allegations
 22 contained therein – and Defendants deny all liability and/or wrongdoing.

23 14. Answering paragraph 14 of the Complaint, under the header “Parties”:
 24 Defendants do not have sufficient knowledge, or information or belief, to enable
 25 Defendants to answer the allegations contained within such paragraph, as stated, and
 26 on those grounds deny generally and specifically each and every of the allegations
 27 contained therein – and Defendants deny all liability and/or wrongdoing.

28 15. Answering paragraph 15 of the Complaint, under the header “Parties”:

1 Defendants do not have sufficient knowledge, or information or belief, to enable
2 Defendants to answer the allegations contained within such paragraph, as stated, and
3 on those grounds deny generally and specifically each and every of the allegations
4 contained therein – and Defendants deny all liability and/or wrongdoing.

5 16. Answering paragraph 16 of the Complaint, under the header “Parties”:
6 Defendants do not have sufficient knowledge, or information or belief, to enable
7 Defendants to answer the allegations contained within such paragraph, as stated, and
8 on those grounds deny generally and specifically each and every of the allegations
9 contained therein – and Defendants deny all liability and/or wrongdoing.

10 17. Answering paragraph 17 of the Complaint, under the header “Parties”:
11 Defendants do not have sufficient knowledge, or information or belief, to enable
12 Defendants to answer the allegations contained within such paragraph, as stated, and
13 on those grounds deny generally and specifically each and every of the allegations
14 contained therein – and Defendants deny all liability and/or wrongdoing.

15 18. Answering paragraph 18 of the Complaint, under the header “Parties”:
16 Defendants do not have sufficient knowledge, or information or belief, to enable
17 Defendants to answer the allegations contained within such paragraph, as stated, and
18 on those grounds deny generally and specifically each and every of the allegations
19 contained therein – and Defendants deny all liability and/or wrongdoing.

20 19. Answering paragraph 19 of the Complaint, under the header “Parties”:
21 Defendants do not have sufficient knowledge, or information or belief, to enable
22 Defendants to answer the allegations contained within such paragraph, as stated, and
23 on those grounds deny generally and specifically each and every of the allegations
24 contained therein – and Defendants deny all liability and/or wrongdoing.

25 20. Answering paragraph 20 of the Complaint, under the header “Parties”:
26 Defendants do not have sufficient knowledge, or information or belief, to enable
27 Defendants to answer the allegations contained within such paragraph, as stated, and
28 on those grounds deny generally and specifically each and every of the allegations

1 contained therein – and Defendants deny all liability and/or wrongdoing.

2 21. Answering paragraph 21 of the Complaint, under the header “Parties”:
3 Defendants do not have sufficient knowledge, or information or belief, to enable
4 Defendants to answer the allegations contained within such paragraph, as stated, and
5 on those grounds deny generally and specifically each and every of the allegations
6 contained therein – and Defendants deny all liability and/or wrongdoing.

7 22. Answering paragraph 22 of the Complaint, under the header “Parties”:
8 Defendants do not have sufficient knowledge, or information or belief, to enable
9 Defendants to answer the allegations contained within such paragraph, as stated, and
10 on those grounds deny generally and specifically each and every of the allegations
11 contained therein – and Defendants deny all liability and/or wrongdoing.

12 23. Answering paragraph 23 of the Complaint, under the header “Parties”:
13 Defendants do not have sufficient knowledge, or information or belief, to enable
14 Defendants to answer the allegations contained within such paragraph, as stated, and
15 on those grounds deny generally and specifically each and every of the allegations
16 contained therein – and Defendants deny all liability and/or wrongdoing.

17 24. Answering paragraph 24 of the Complaint, under the header “Parties”:
18 Defendants do not have sufficient knowledge, or information or belief, to enable
19 Defendants to answer the allegations contained within such paragraph, as stated, and
20 on those grounds deny generally and specifically each and every of the allegations
21 contained therein – and Defendants deny all liability and/or wrongdoing.

22 25. Answering paragraph 25 of the Complaint, under the header “Parties”:
23 Defendants do not have sufficient knowledge, or information or belief, to enable
24 Defendants to answer the allegations contained within such paragraph, as stated, and
25 on those grounds deny generally and specifically each and every of the allegations
26 contained therein – and Defendants deny all liability and/or wrongdoing.

27 26. Answering paragraph 26 of the Complaint, under the header “Parties”:
28 Defendants do not have sufficient knowledge, or information or belief, to enable

1 Defendants to answer the allegations contained within such paragraph, as stated, and
 2 on those grounds deny generally and specifically each and every of the allegations
 3 contained therein – and Defendants deny all liability and/or wrongdoing.

4 27. Answering paragraph 27 of the Complaint, under the header “Parties”:
 5 Defendants do not have sufficient knowledge, or information or belief, to enable
 6 Defendants to answer the allegations contained within such paragraph, as stated, and
 7 on those grounds deny generally and specifically each and every of the allegations
 8 contained therein – and Defendants deny all liability and/or wrongdoing.

9 28. Answering paragraph 28 of the Complaint, under the header “Parties”:
 10 Defendants do not have sufficient knowledge, or information or belief, to enable
 11 Defendants to answer the allegations contained within such paragraph, as stated, and
 12 on those grounds deny generally and specifically each and every of the allegations
 13 contained therein – and Defendants deny all liability and/or wrongdoing.

14 29. Answering paragraph 29 of the Complaint, under the header “Parties”:
 15 Defendants do not have sufficient knowledge, or information or belief, to enable
 16 Defendants to answer the allegations contained within such paragraph, as stated, and
 17 on those grounds deny generally and specifically each and every of the allegations
 18 contained therein – and Defendants deny all liability and/or wrongdoing.

19 30. Answering paragraph 30 of the Complaint, under the header “Parties”:
 20 Defendants do not have sufficient knowledge, or information or belief, to enable
 21 Defendants to answer the allegations contained within such paragraph, as stated, and
 22 on those grounds deny generally and specifically each and every of the allegations
 23 contained therein – and Defendants deny all liability and/or wrongdoing.

24 31. Answering paragraph 31 of the Complaint, under the header “Factual
 25 Allegations Common to All Causes of Action”: Defendants do not have sufficient
 26 knowledge, or information or belief, to enable Defendants to answer the allegations
 27 contained within such paragraph, as stated, and on those grounds deny generally and
 28 specifically each and every of the allegations contained therein – and Defendants

1 deny all liability and/or wrongdoing.

2 32. Answering paragraph 32 of the Complaint, under the header “Factual
3 Allegations Common to All Causes of Action”: Defendants do not have sufficient
4 knowledge, or information or belief, to enable Defendants to answer the allegations
5 contained within such paragraph, as stated, and on those grounds deny generally and
6 specifically each and every of the allegations contained therein – and Defendants
7 deny all liability and/or wrongdoing.

8 33. Answering paragraph 33 of the Complaint, under the header “Factual
9 Allegations Common to All Causes of Action”: Defendants do not have sufficient
10 knowledge, or information or belief, to enable Defendants to answer the allegations
11 contained within such paragraph, as stated, and on those grounds deny generally and
12 specifically each and every of the allegations contained therein – and Defendants
13 deny all liability and/or wrongdoing.

14 34. Answering paragraph 34 of the Complaint, under the header “Factual
15 Allegations Common to All Causes of Action”: Defendants do not have sufficient
16 knowledge, or information or belief, to enable Defendants to answer the allegations
17 contained within such paragraph, as stated, and on those grounds deny generally and
18 specifically each and every of the allegations contained therein – and Defendants
19 deny all liability and/or wrongdoing.

20 35. Answering paragraph 35 of the Complaint, under the header “Factual
21 Allegations Common to All Causes of Action”: Defendants do not have sufficient
22 knowledge, or information or belief, to enable Defendants to answer the allegations
23 contained within such paragraph, as stated, and on those grounds deny generally and
24 specifically each and every of the allegations contained therein – and Defendants
25 deny all liability and/or wrongdoing.

26 36. Answering paragraph 36 of the Complaint, under the header “Factual
27 Allegations Common to All Causes of Action”: Defendants do not have sufficient
28 knowledge, or information or belief, to enable Defendants to answer the allegations

1 contained within such paragraph, as stated, and on those grounds deny generally and
 2 specifically each and every of the allegations contained therein – and Defendants
 3 deny all liability and/or wrongdoing.

4 37. Answering paragraph 37 of the Complaint, under the header “Factual
 5 Allegations Common to All Causes of Action”: Defendants do not have sufficient
 6 knowledge, or information or belief, to enable Defendants to answer the allegations
 7 contained within such paragraph, as stated, and on those grounds deny generally and
 8 specifically each and every of the allegations contained therein – and Defendants
 9 deny all liability and/or wrongdoing.

10 38. Answering paragraph 38 of the Complaint, under the header “Factual
 11 Allegations Common to All Causes of Action”: Defendants do not have sufficient
 12 knowledge, or information or belief, to enable Defendants to answer the allegations
 13 contained within such paragraph, as stated, and on those grounds deny generally and
 14 specifically each and every of the allegations contained therein – and Defendants
 15 deny all liability and/or wrongdoing.

16 39. Answering paragraph 39 of the Complaint, under the header “Factual
 17 Allegations Common to All Causes of Action”: Defendants do not have sufficient
 18 knowledge, or information or belief, to enable Defendants to answer the allegations
 19 contained within such paragraph, as stated, and on those grounds deny generally and
 20 specifically each and every of the allegations contained therein – and Defendants
 21 deny all liability and/or wrongdoing.

22 40. Answering paragraph 40 of the Complaint, under the header “Factual
 23 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 24 not have sufficient knowledge, or information or belief, to enable Defendants to
 25 answer the allegations contained within such paragraph, as stated, and on those
 26 grounds deny generally and specifically each and every of the allegations contained
 27 therein – and Defendants deny all liability and/or wrongdoing.

28 41. Answering paragraph 41 of the Complaint, under the header “Factual

1 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 2 not have sufficient knowledge, or information or belief, to enable Defendants to
 3 answer the allegations contained within such paragraph, as stated, and on those
 4 grounds deny generally and specifically each and every of the allegations contained
 5 therein – and Defendants deny all liability and/or wrongdoing.

6 42. Answering paragraph 42 of the Complaint, under the header “Factual
 7 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 8 not have sufficient knowledge, or information or belief, to enable Defendants to
 9 answer the allegations contained within such paragraph, as stated, and on those
 10 grounds deny generally and specifically each and every of the allegations contained
 11 therein – and Defendants deny all liability and/or wrongdoing.

12 43. Answering paragraph 43 of the Complaint, under the header “Factual
 13 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 14 not have sufficient knowledge, or information or belief, to enable Defendants to
 15 answer the allegations contained within such paragraph, as stated, and on those
 16 grounds deny generally and specifically each and every of the allegations contained
 17 therein – and Defendants deny all liability and/or wrongdoing.

18 44. Answering paragraph 44 of the Complaint, under the header “Factual
 19 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 20 not have sufficient knowledge, or information or belief, to enable Defendants to
 21 answer the allegations contained within such paragraph, as stated, and on those
 22 grounds deny generally and specifically each and every of the allegations contained
 23 therein – and Defendants deny all liability and/or wrongdoing.

24 45. Answering paragraph 45 of the Complaint, under the header “Factual
 25 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 26 not have sufficient knowledge, or information or belief, to enable Defendants to
 27 answer the allegations contained within such paragraph, as stated, and on those
 28 grounds deny generally and specifically each and every of the allegations contained

1 therein – and Defendants deny all liability and/or wrongdoing.

2 46. Answering paragraph 46 of the Complaint, under the header “Factual
3 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
4 not have sufficient knowledge, or information or belief, to enable Defendants to
5 answer the allegations contained within such paragraph, as stated, and on those
6 grounds deny generally and specifically each and every of the allegations contained
7 therein – and Defendants deny all liability and/or wrongdoing.

8 47. Answering paragraph 47 of the Complaint, under the header “Factual
9 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
10 not have sufficient knowledge, or information or belief, to enable Defendants to
11 answer the allegations contained within such paragraph, as stated, and on those
12 grounds deny generally and specifically each and every of the allegations contained
13 therein – and Defendants deny all liability and/or wrongdoing.

14 48. Answering paragraph 48 of the Complaint, under the header “Factual
15 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
16 not have sufficient knowledge, or information or belief, to enable Defendants to
17 answer the allegations contained within such paragraph, as stated, and on those
18 grounds deny generally and specifically each and every of the allegations contained
19 therein – and Defendants deny all liability and/or wrongdoing.

20 49. Answering paragraph 49 of the Complaint, under the header “Factual
21 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
22 not have sufficient knowledge, or information or belief, to enable Defendants to
23 answer the allegations contained within such paragraph, as stated, and on those
24 grounds deny generally and specifically each and every of the allegations contained
25 therein – and Defendants deny all liability and/or wrongdoing.

26 50. Answering paragraph 50 of the Complaint, under the header “Factual
27 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
28 not have sufficient knowledge, or information or belief, to enable Defendants to

1 answer the allegations contained within such paragraph, as stated, and on those
 2 grounds deny generally and specifically each and every of the allegations contained
 3 therein – and Defendants deny all liability and/or wrongdoing.

4 51. Answering paragraph 51 of the Complaint, under the header “Factual
 5 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 6 not have sufficient knowledge, or information or belief, to enable Defendants to
 7 answer the allegations contained within such paragraph, as stated, and on those
 8 grounds deny generally and specifically each and every of the allegations contained
 9 therein – and Defendants deny all liability and/or wrongdoing.

10 52. Answering paragraph 52 of the Complaint, under the header “Factual
 11 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 12 not have sufficient knowledge, or information or belief, to enable Defendants to
 13 answer the allegations contained within such paragraph, as stated, and on those
 14 grounds deny generally and specifically each and every of the allegations contained
 15 therein – and Defendants deny all liability and/or wrongdoing.

16 53. Answering paragraph 53 of the Complaint, under the header “Factual
 17 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 18 not have sufficient knowledge, or information or belief, to enable Defendants to
 19 answer the allegations contained within such paragraph, as stated, and on those
 20 grounds deny generally and specifically each and every of the allegations contained
 21 therein – and Defendants deny all liability and/or wrongdoing.

22 54. Answering paragraph 54 of the Complaint, under the header “Factual
 23 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 24 not have sufficient knowledge, or information or belief, to enable Defendants to
 25 answer the allegations contained within such paragraph, as stated, and on those
 26 grounds deny generally and specifically each and every of the allegations contained
 27 therein – and Defendants deny all liability and/or wrongdoing.

28 55. Answering paragraph 55 of the Complaint, under the header “Factual

1 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 2 not have sufficient knowledge, or information or belief, to enable Defendants to
 3 answer the allegations contained within such paragraph, as stated, and on those
 4 grounds deny generally and specifically each and every of the allegations contained
 5 therein – and Defendants deny all liability and/or wrongdoing.

6 56. Answering paragraph 56 of the Complaint, under the header “Factual
 7 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 8 not have sufficient knowledge, or information or belief, to enable Defendants to
 9 answer the allegations contained within such paragraph, as stated, and on those
 10 grounds deny generally and specifically each and every of the allegations contained
 11 therein – and Defendants deny all liability and/or wrongdoing.

12 57. Answering paragraph 57 of the Complaint, under the header “Factual
 13 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 14 not have sufficient knowledge, or information or belief, to enable Defendants to
 15 answer the allegations contained within such paragraph, as stated, and on those
 16 grounds deny generally and specifically each and every of the allegations contained
 17 therein – and Defendants deny all liability and/or wrongdoing.

18 58. Answering paragraph 58 of the Complaint, under the header “Factual
 19 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 20 not have sufficient knowledge, or information or belief, to enable Defendants to
 21 answer the allegations contained within such paragraph, as stated, and on those
 22 grounds deny generally and specifically each and every of the allegations contained
 23 therein – and Defendants deny all liability and/or wrongdoing.

24 59. Answering paragraph 59 of the Complaint, under the header “Factual
 25 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 26 not have sufficient knowledge, or information or belief, to enable Defendants to
 27 answer the allegations contained within such paragraph, as stated, and on those
 28 grounds deny generally and specifically each and every of the allegations contained

1 therein – and Defendants deny all liability and/or wrongdoing.

2 60. Answering paragraph 60 of the Complaint, under the header “Factual
3 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
4 not have sufficient knowledge, or information or belief, to enable Defendants to
5 answer the allegations contained within such paragraph, as stated, and on those
6 grounds deny generally and specifically each and every of the allegations contained
7 therein – and Defendants deny all liability and/or wrongdoing.

8 61. Answering paragraph 61 of the Complaint, under the header “Factual
9 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
10 not have sufficient knowledge, or information or belief, to enable Defendants to
11 answer the allegations contained within such paragraph, as stated, and on those
12 grounds deny generally and specifically each and every of the allegations contained
13 therein – and Defendants deny all liability and/or wrongdoing.

14 62. Answering paragraph 62 of the Complaint, under the header “Factual
15 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
16 not have sufficient knowledge, or information or belief, to enable Defendants to
17 answer the allegations contained within such paragraph, as stated, and on those
18 grounds deny generally and specifically each and every of the allegations contained
19 therein – and Defendants deny all liability and/or wrongdoing.

20 63. Answering paragraph 63 of the Complaint, under the header “Factual
21 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
22 not have sufficient knowledge, or information or belief, to enable Defendants to
23 answer the allegations contained within such paragraph, as stated, and on those
24 grounds deny generally and specifically each and every of the allegations contained
25 therein – and Defendants deny all liability and/or wrongdoing.

26 64. Answering paragraph 64 of the Complaint, under the header “Factual
27 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
28 not have sufficient knowledge, or information or belief, to enable Defendants to

1 answer the allegations contained within such paragraph, as stated, and on those
2 grounds deny generally and specifically each and every of the allegations contained
3 therein – and Defendants deny all liability and/or wrongdoing.

4 65. Answering paragraph 65 of the Complaint, under the header “Factual
5 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
6 not have sufficient knowledge, or information or belief, to enable Defendants to
7 answer the allegations contained within such paragraph, as stated, and on those
8 grounds deny generally and specifically each and every of the allegations contained
9 therein – and Defendants deny all liability and/or wrongdoing.

10 66. Answering paragraph 66 of the Complaint, under the header “Factual
11 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
12 not have sufficient knowledge, or information or belief, to enable Defendants to
13 answer the allegations contained within such paragraph, as stated, and on those
14 grounds deny generally and specifically each and every of the allegations contained
15 therein – and Defendants deny all liability and/or wrongdoing.

16 67. Answering paragraph 67 of the Complaint, under the header “Factual
17 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
18 not have sufficient knowledge, or information or belief, to enable Defendants to
19 answer the allegations contained within such paragraph, as stated, and on those
20 grounds deny generally and specifically each and every of the allegations contained
21 therein – and Defendants deny all liability and/or wrongdoing.

22 68. Answering paragraph 68 of the Complaint, under the header “Factual
23 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
24 not have sufficient knowledge, or information or belief, to enable Defendants to
25 answer the allegations contained within such paragraph, as stated, and on those
26 grounds deny generally and specifically each and every of the allegations contained
27 therein – and Defendants deny all liability and/or wrongdoing.

28 69. Answering paragraph 69 of the Complaint, under the header “Factual

1 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 2 not have sufficient knowledge, or information or belief, to enable Defendants to
 3 answer the allegations contained within such paragraph, as stated, and on those
 4 grounds deny generally and specifically each and every of the allegations contained
 5 therein – and Defendants deny all liability and/or wrongdoing.

6 70. Answering paragraph 70 of the Complaint, under the header “Factual
 7 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 8 not have sufficient knowledge, or information or belief, to enable Defendants to
 9 answer the allegations contained within such paragraph, as stated, and on those
 10 grounds deny generally and specifically each and every of the allegations contained
 11 therein – and Defendants deny all liability and/or wrongdoing.

12 71. Answering paragraph 71 of the Complaint, under the header “Factual
 13 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 14 not have sufficient knowledge, or information or belief, to enable Defendants to
 15 answer the allegations contained within such paragraph, as stated, and on those
 16 grounds deny generally and specifically each and every of the allegations contained
 17 therein – and Defendants deny all liability and/or wrongdoing.

18 72. Answering paragraph 72 of the Complaint, under the header “Factual
 19 Allegations Common to *Monell* and Supervisorial Causes of Action”: Defendants do
 20 not have sufficient knowledge, or information or belief, to enable Defendants to
 21 answer the allegations contained within such paragraph, as stated, and on those
 22 grounds deny generally and specifically each and every of the allegations contained
 23 therein – and Defendants deny all liability and/or wrongdoing.

24 73. Answering paragraph 73 of the Complaint, under the header
 25 “Punitive/Exemplary Damages Allegations”: Defendants do not have sufficient
 26 knowledge, or information or belief, to enable Defendants to answer the allegations
 27 contained within such paragraph, as stated, and on those grounds deny generally and
 28 specifically each and every of the allegations contained therein – and Defendants

1 deny all liability and/or wrongdoing.

2 74. Answering paragraph 74 of the Complaint, under the header
3 “Punitive/Exemplary Damages Allegations”: Defendants do not have sufficient
4 knowledge, or information or belief, to enable Defendants to answer the allegations
5 contained within such paragraph, as stated, and on those grounds deny generally and
6 specifically each and every of the allegations contained therein – and Defendants
7 deny all liability and/or wrongdoing.

8 75. Answering paragraph 75 of the Complaint, under the header
9 “Punitive/Exemplary Damages Allegations”: Defendants do not have sufficient
10 knowledge, or information or belief, to enable Defendants to answer the allegations
11 contained within such paragraph, as stated, and on those grounds deny generally and
12 specifically each and every of the allegations contained therein – and Defendants
13 deny all liability and/or wrongdoing.

14 76. Answering paragraph 76 of the Complaint, under the header
15 “Punitive/Exemplary Damages Allegations”: Defendants do not have sufficient
16 knowledge, or information or belief, to enable Defendants to answer the allegations
17 contained within such paragraph, as stated, and on those grounds deny generally and
18 specifically each and every of the allegations contained therein – and Defendants
19 deny all liability and/or wrongdoing.

20 77. Answering paragraph 77 of the Complaint, under the header
21 “Punitive/Exemplary Damages Allegations”: Defendants do not have sufficient
22 knowledge, or information or belief, to enable Defendants to answer the allegations
23 contained within such paragraph, as stated, and on those grounds deny generally and
24 specifically each and every of the allegations contained therein – and Defendants
25 deny all liability and/or wrongdoing.

26 78. Answering paragraph 78 of the Complaint, under the header “First
27 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
28 and denials contained in the foregoing Answer which are set forth to each and every

1 allegation contained in paragraphs 1 through 77, inclusive, of the Complaint.

2 79. Answering paragraph 79 of the Complaint, under the header “First
3 Cause of Action”: Defendants do not have sufficient knowledge, or information or
4 belief, to enable Defendants to answer the allegations contained within such
5 paragraph, as stated, and on those grounds deny generally and specifically each and
6 every of the allegations contained therein – and Defendants deny all liability and/or
7 wrongdoing.

8 80. Answering paragraph 80 of the Complaint, under the header “First
9 Cause of Action”: Defendants do not have sufficient knowledge, or information or
10 belief, to enable Defendants to answer the allegations contained within such
11 paragraph, as stated, and on those grounds deny generally and specifically each and
12 every of the allegations contained therein – and Defendants deny all liability and/or
13 wrongdoing.

14 81. Answering paragraph 81 of the Complaint, under the header “First
15 Cause of Action”: Defendants do not have sufficient knowledge, or information or
16 belief, to enable Defendants to answer the allegations contained within such
17 paragraph, as stated, and on those grounds deny generally and specifically each and
18 every of the allegations contained therein – and Defendants deny all liability and/or
19 wrongdoing.

20 82. Answering paragraph 82 of the Complaint, under the header “First
21 Cause of Action”: Defendants do not have sufficient knowledge, or information or
22 belief, to enable Defendants to answer the allegations contained within such
23 paragraph, as stated, and on those grounds deny generally and specifically each and
24 every of the allegations contained therein – and Defendants deny all liability and/or
25 wrongdoing.

26 83. Answering paragraph 83 of the Complaint, under the header “First
27 Cause of Action”: Defendants do not have sufficient knowledge, or information or
28 belief, to enable Defendants to answer the allegations contained within such

1 paragraph, as stated, and on those grounds deny generally and specifically each and
 2 every of the allegations contained therein – and Defendants deny all liability and/or
 3 wrongdoing.

4 84. Answering paragraph 84 of the Complaint, under the header “First
 5 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 6 belief, to enable Defendants to answer the allegations contained within such
 7 paragraph, as stated, and on those grounds deny generally and specifically each and
 8 every of the allegations contained therein – and Defendants deny all liability and/or
 9 wrongdoing.

10 85. Answering paragraph 85 of the Complaint, under the header “First
 11 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 12 belief, to enable Defendants to answer the allegations contained within such
 13 paragraph, as stated, and on those grounds deny generally and specifically each and
 14 every of the allegations contained therein – and Defendants deny all liability and/or
 15 wrongdoing.

16 86. Answering paragraph 86 of the Complaint, under the header “First
 17 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 18 belief, to enable Defendants to answer the allegations contained within such
 19 paragraph, as stated, and on those grounds deny generally and specifically each and
 20 every of the allegations contained therein – and Defendants deny all liability and/or
 21 wrongdoing.

22 87. Answering paragraph 87 of the Complaint, under the header “First
 23 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 24 belief, to enable Defendants to answer the allegations contained within such
 25 paragraph, as stated, and on those grounds deny generally and specifically each and
 26 every of the allegations contained therein – and Defendants deny all liability and/or
 27 wrongdoing.

28 88. Answering paragraph 88 of the Complaint, under the header “First

1 Cause of Action”: Defendants do not have sufficient knowledge, or information or
2 belief, to enable Defendants to answer the allegations contained within such
3 paragraph, as stated, and on those grounds deny generally and specifically each and
4 every of the allegations contained therein – and Defendants deny all liability and/or
5 wrongdoing.

6 89. Answering paragraph 89 of the Complaint, under the header “First
7 Cause of Action”: Defendants do not have sufficient knowledge, or information or
8 belief, to enable Defendants to answer the allegations contained within such
9 paragraph, as stated, and on those grounds deny generally and specifically each and
10 every of the allegations contained therein – and Defendants deny all liability and/or
11 wrongdoing.

12 90. Answering paragraph 90 of the Complaint, under the header “First
13 Cause of Action”: Defendants do not have sufficient knowledge, or information or
14 belief, to enable Defendants to answer the allegations contained within such
15 paragraph, as stated, and on those grounds deny generally and specifically each and
16 every of the allegations contained therein – and Defendants deny all liability and/or
17 wrongdoing.

18 91. Answering paragraph 91 of the Complaint, under the header “First
19 Cause of Action”: Defendants do not have sufficient knowledge, or information or
20 belief, to enable Defendants to answer the allegations contained within such
21 paragraph, as stated, and on those grounds deny generally and specifically each and
22 every of the allegations contained therein – and Defendants deny all liability and/or
23 wrongdoing.

24 92. Answering paragraph 92 of the Complaint, under the header “First
25 Cause of Action”: Defendants do not have sufficient knowledge, or information or
26 belief, to enable Defendants to answer the allegations contained within such
27 paragraph, as stated, and on those grounds deny generally and specifically each and
28 every of the allegations contained therein – and Defendants deny all liability and/or

1 wrongdoing.

2 93. Answering paragraph 93 of the Complaint, under the header “First
3 Cause of Action”: Defendants do not have sufficient knowledge, or information or
4 belief, to enable Defendants to answer the allegations contained within such
5 paragraph, as stated, and on those grounds deny generally and specifically each and
6 every of the allegations contained therein – and Defendants deny all liability and/or
7 wrongdoing.

8 94. Answering paragraph 94 of the Complaint, under the header “First
9 Cause of Action”: Defendants do not have sufficient knowledge, or information or
10 belief, to enable Defendants to answer the allegations contained within such
11 paragraph, as stated, and on those grounds deny generally and specifically each and
12 every of the allegations contained therein – and Defendants deny all liability and/or
13 wrongdoing.

14 95. Answering paragraph 95 of the Complaint, under the header “Second
15 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
16 and denials contained in the foregoing Answer which are set forth to each and every
17 allegation contained in paragraphs 1 through 94, inclusive, of the Complaint.

18 96. Answering paragraph 96 of the Complaint, under the header “Second
19 Cause of Action”: Defendants do not have sufficient knowledge, or information or
20 belief, to enable Defendants to answer the allegations contained within such
21 paragraph, as stated, and on those grounds deny generally and specifically each and
22 every of the allegations contained therein – and Defendants deny all liability and/or
23 wrongdoing.

24 97. Answering paragraph 97 of the Complaint, under the header “Second
25 Cause of Action”: Defendants do not have sufficient knowledge, or information or
26 belief, to enable Defendants to answer the allegations contained within such
27 paragraph, as stated, and on those grounds deny generally and specifically each and
28 every of the allegations contained therein – and Defendants deny all liability and/or

1 wrongdoing.

2 98. Answering paragraph 98 of the Complaint, under the header “Second
3 Cause of Action”: Defendants do not have sufficient knowledge, or information or
4 belief, to enable Defendants to answer the allegations contained within such
5 paragraph, as stated, and on those grounds deny generally and specifically each and
6 every of the allegations contained therein – and Defendants deny all liability and/or
7 wrongdoing.

8 99. Answering paragraph 99 of the Complaint, under the header “Second
9 Cause of Action”: Defendants do not have sufficient knowledge, or information or
10 belief, to enable Defendants to answer the allegations contained within such
11 paragraph, as stated, and on those grounds deny generally and specifically each and
12 every of the allegations contained therein – and Defendants deny all liability and/or
13 wrongdoing.

14 100. Answering paragraph 100 of the Complaint, under the header “Second
15 Cause of Action”: Defendants do not have sufficient knowledge, or information or
16 belief, to enable Defendants to answer the allegations contained within such
17 paragraph, as stated, and on those grounds deny generally and specifically each and
18 every of the allegations contained therein – and Defendants deny all liability and/or
19 wrongdoing.

20 101. Answering paragraph 101 of the Complaint, under the header “Second
21 Cause of Action”: Defendants do not have sufficient knowledge, or information or
22 belief, to enable Defendants to answer the allegations contained within such
23 paragraph, as stated, and on those grounds deny generally and specifically each and
24 every of the allegations contained therein – and Defendants deny all liability and/or
25 wrongdoing.

26 102. Answering paragraph 102 of the Complaint, under the header “Second
27 Cause of Action”: Defendants do not have sufficient knowledge, or information or
28 belief, to enable Defendants to answer the allegations contained within such

1 paragraph, as stated, and on those grounds deny generally and specifically each and
2 every of the allegations contained therein – and Defendants deny all liability and/or
3 wrongdoing.

4 103. Answering paragraph 103 of the Complaint, under the header “Third
5 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
6 and denials contained in the foregoing Answer which are set forth to each and every
7 allegation contained in paragraphs 1 through 102, inclusive, of the Complaint.

8 104. Answering paragraph 104 of the Complaint, under the header “Third
9 Cause of Action”: Defendants do not have sufficient knowledge, or information or
10 belief, to enable Defendants to answer the allegations contained within such
11 paragraph, as stated, and on those grounds deny generally and specifically each and
12 every of the allegations contained therein – and Defendants deny all liability and/or
13 wrongdoing.

14 105. Answering paragraph 105 of the Complaint, under the header “Third
15 Cause of Action”: Defendants do not have sufficient knowledge, or information or
16 belief, to enable Defendants to answer the allegations contained within such
17 paragraph, as stated, and on those grounds deny generally and specifically each and
18 every of the allegations contained therein – and Defendants deny all liability and/or
19 wrongdoing.

20 106. Answering paragraph 106 of the Complaint, under the header “Third
21 Cause of Action”: Defendants do not have sufficient knowledge, or information or
22 belief, to enable Defendants to answer the allegations contained within such
23 paragraph, as stated, and on those grounds deny generally and specifically each and
24 every of the allegations contained therein – and Defendants deny all liability and/or
25 wrongdoing.

26 107. Answering paragraph 107 of the Complaint, under the header “Third
27 Cause of Action”: Defendants do not have sufficient knowledge, or information or
28 belief, to enable Defendants to answer the allegations contained within such

1 paragraph, as stated, and on those grounds deny generally and specifically each and
 2 every of the allegations contained therein – and Defendants deny all liability and/or
 3 wrongdoing.

4 108. Answering paragraph 108 of the Complaint, under the header “Third
 5 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 6 belief, to enable Defendants to answer the allegations contained within such
 7 paragraph, as stated, and on those grounds deny generally and specifically each and
 8 every of the allegations contained therein – and Defendants deny all liability and/or
 9 wrongdoing.

10 109. Answering paragraph 109 of the Complaint, under the header “Third
 11 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 12 belief, to enable Defendants to answer the allegations contained within such
 13 paragraph, as stated, and on those grounds deny generally and specifically each and
 14 every of the allegations contained therein – and Defendants deny all liability and/or
 15 wrongdoing.

16 110. Answering paragraph 110 of the Complaint, under the header “Third
 17 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 18 belief, to enable Defendants to answer the allegations contained within such
 19 paragraph, as stated, and on those grounds deny generally and specifically each and
 20 every of the allegations contained therein – and Defendants deny all liability and/or
 21 wrongdoing.

22 111. Answering paragraph 111 of the Complaint, under the header “Third
 23 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 24 belief, to enable Defendants to answer the allegations contained within such
 25 paragraph, as stated, and on those grounds deny generally and specifically each and
 26 every of the allegations contained therein – and Defendants deny all liability and/or
 27 wrongdoing.

28 112. Answering paragraph 112 of the Complaint, under the header “Third

1 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 2 belief, to enable Defendants to answer the allegations contained within such
 3 paragraph, as stated, and on those grounds deny generally and specifically each and
 4 every of the allegations contained therein – and Defendants deny all liability and/or
 5 wrongdoing.

6 113. Answering paragraph 113 of the Complaint, under the header “Third
 7 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 8 belief, to enable Defendants to answer the allegations contained within such
 9 paragraph, as stated, and on those grounds deny generally and specifically each and
 10 every of the allegations contained therein – and Defendants deny all liability and/or
 11 wrongdoing.

12 114. Answering paragraph 114 of the Complaint, under the header “Third
 13 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 14 belief, to enable Defendants to answer the allegations contained within such
 15 paragraph, as stated, and on those grounds deny generally and specifically each and
 16 every of the allegations contained therein – and Defendants deny all liability and/or
 17 wrongdoing.

18 115. Answering paragraph 115 of the Complaint, under the header “Third
 19 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 20 belief, to enable Defendants to answer the allegations contained within such
 21 paragraph, as stated, and on those grounds deny generally and specifically each and
 22 every of the allegations contained therein – and Defendants deny all liability and/or
 23 wrongdoing.

24 116. Answering paragraph 116 of the Complaint, under the header “Fourth
 25 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
 26 and denials contained in the foregoing Answer which are set forth to each and every
 27 allegation contained in paragraphs 1 through 115, inclusive, of the Complaint.

28 117. Answering paragraph 117 of the Complaint, under the header “Fourth

1 Cause of Action”: Defendants do not have sufficient knowledge, or information or
2 belief, to enable Defendants to answer the allegations contained within such
3 paragraph, as stated, and on those grounds deny generally and specifically each and
4 every of the allegations contained therein – and Defendants deny all liability and/or
5 wrongdoing.

6 118. Answering paragraph 118 of the Complaint, under the header “Fourth
7 Cause of Action”: Defendants do not have sufficient knowledge, or information or
8 belief, to enable Defendants to answer the allegations contained within such
9 paragraph, as stated, and on those grounds deny generally and specifically each and
10 every of the allegations contained therein – and Defendants deny all liability and/or
11 wrongdoing.

12 119. Answering paragraph 119 of the Complaint, under the header “Fourth
13 Cause of Action”: Defendants do not have sufficient knowledge, or information or
14 belief, to enable Defendants to answer the allegations contained within such
15 paragraph, as stated, and on those grounds deny generally and specifically each and
16 every of the allegations contained therein – and Defendants deny all liability and/or
17 wrongdoing.

18 120. Answering paragraph 120 of the Complaint, under the header “Fourth
19 Cause of Action”: Defendants do not have sufficient knowledge, or information or
20 belief, to enable Defendants to answer the allegations contained within such
21 paragraph, as stated, and on those grounds deny generally and specifically each and
22 every of the allegations contained therein – and Defendants deny all liability and/or
23 wrongdoing.

24 121. Answering paragraph 121 of the Complaint, under the header “Fourth
25 Cause of Action”: Defendants do not have sufficient knowledge, or information or
26 belief, to enable Defendants to answer the allegations contained within such
27 paragraph, as stated, and on those grounds deny generally and specifically each and
28 every of the allegations contained therein – and Defendants deny all liability and/or

1 wrongdoing.

2 122. Answering paragraph 122 of the Complaint, under the header “Fourth
3 Cause of Action”: Defendants do not have sufficient knowledge, or information or
4 belief, to enable Defendants to answer the allegations contained within such
5 paragraph, as stated, and on those grounds deny generally and specifically each and
6 every of the allegations contained therein – and Defendants deny all liability and/or
7 wrongdoing.

8 123. Answering paragraph 123 of the Complaint, under the header “Fourth
9 [sic] Cause of Action”: Defendants repeat, reiterate, and re-allege all of the
10 admissions and denials contained in the foregoing Answer which are set forth to
11 each and every allegation contained in paragraphs 1 through 122, inclusive, of the
12 Complaint.

13 124. Answering paragraph 124 of the Complaint, under the header “Fourth
14 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
15 or belief, to enable Defendants to answer the allegations contained within such
16 paragraph, as stated, and on those grounds deny generally and specifically each and
17 every of the allegations contained therein – and Defendants deny all liability and/or
18 wrongdoing.

19 125. Answering paragraph 125 of the Complaint, under the header “Fourth
20 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
21 or belief, to enable Defendants to answer the allegations contained within such
22 paragraph, as stated, and on those grounds deny generally and specifically each and
23 every of the allegations contained therein – and Defendants deny all liability and/or
24 wrongdoing.

25 126. Answering paragraph 126 of the Complaint, under the header “Fourth
26 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
27 or belief, to enable Defendants to answer the allegations contained within such
28 paragraph, as stated, and on those grounds deny generally and specifically each and

1 every of the allegations contained therein – and Defendants deny all liability and/or
2 wrongdoing.

3 127. Answering paragraph 127 of the Complaint, under the header “Fourth
4 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
5 or belief, to enable Defendants to answer the allegations contained within such
6 paragraph, as stated, and on those grounds deny generally and specifically each and
7 every of the allegations contained therein – and Defendants deny all liability and/or
8 wrongdoing.

9 128. Answering paragraph 128 of the Complaint, under the header “Fourth
10 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
11 or belief, to enable Defendants to answer the allegations contained within such
12 paragraph, as stated, and on those grounds deny generally and specifically each and
13 every of the allegations contained therein – and Defendants deny all liability and/or
14 wrongdoing.

15 129. Answering paragraph 129 of the Complaint, under the header “Fourth
16 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
17 or belief, to enable Defendants to answer the allegations contained within such
18 paragraph, as stated, and on those grounds deny generally and specifically each and
19 every of the allegations contained therein – and Defendants deny all liability and/or
20 wrongdoing.

21 130. Answering paragraph 130 of the Complaint, under the header “Fourth
22 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information
23 or belief, to enable Defendants to answer the allegations contained within such
24 paragraph, as stated, and on those grounds deny generally and specifically each and
25 every of the allegations contained therein – and Defendants deny all liability and/or
26 wrongdoing.

27 131. Answering paragraph 131 of the Complaint, under the header “Fourth
28 [sic] Cause of Action”: Defendants do not have sufficient knowledge, or information

1 or belief, to enable Defendants to answer the allegations contained within such
2 paragraph, as stated, and on those grounds deny generally and specifically each and
3 every of the allegations contained therein – and Defendants deny all liability and/or
4 wrongdoing.

5 132. Answering paragraph 132 of the Complaint, under the header “Sixth
6 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
7 and denials contained in the foregoing Answer which are set forth to each and every
8 allegation contained in paragraphs 1 through 131, inclusive, of the Complaint.

9 133. Answering paragraph 133 of the Complaint, under the header “Sixth
10 Cause of Action”: Defendants do not have sufficient knowledge, or information or
11 belief, to enable Defendants to answer the allegations contained within such
12 paragraph, as stated, and on those grounds deny generally and specifically each and
13 every of the allegations contained therein – and Defendants deny all liability and/or
14 wrongdoing.

15 134. Answering paragraph 134 of the Complaint, under the header “Sixth
16 Cause of Action”: Defendants do not have sufficient knowledge, or information or
17 belief, to enable Defendants to answer the allegations contained within such
18 paragraph, as stated, and on those grounds deny generally and specifically each and
19 every of the allegations contained therein – and Defendants deny all liability and/or
20 wrongdoing.

21 135. Answering paragraph 135 of the Complaint, under the header “Sixth
22 Cause of Action”: Defendants do not have sufficient knowledge, or information or
23 belief, to enable Defendants to answer the allegations contained within such
24 paragraph, as stated, and on those grounds deny generally and specifically each and
25 every of the allegations contained therein – and Defendants deny all liability and/or
26 wrongdoing.

27 136. Answering paragraph 136 of the Complaint, under the header “Sixth
28 Cause of Action”: Defendants do not have sufficient knowledge, or information or

1 belief, to enable Defendants to answer the allegations contained within such
2 paragraph, as stated, and on those grounds deny generally and specifically each and
3 every of the allegations contained therein – and Defendants deny all liability and/or
4 wrongdoing.

5 137. Answering paragraph 137 of the Complaint, under the header “Sixth
6 Cause of Action”: Defendants do not have sufficient knowledge, or information or
7 belief, to enable Defendants to answer the allegations contained within such
8 paragraph, as stated, and on those grounds deny generally and specifically each and
9 every of the allegations contained therein – and Defendants deny all liability and/or
10 wrongdoing.

11 138. Answering paragraph 138 of the Complaint, under the header “Sixth
12 Cause of Action”: Defendants do not have sufficient knowledge, or information or
13 belief, to enable Defendants to answer the allegations contained within such
14 paragraph, as stated, and on those grounds deny generally and specifically each and
15 every of the allegations contained therein – and Defendants deny all liability and/or
16 wrongdoing.

17 139. Answering paragraph 139 of the Complaint, under the header “Seventh
18 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
19 and denials contained in the foregoing Answer which are set forth to each and every
20 allegation contained in paragraphs 1 through 138, inclusive, of the Complaint.

21 140. Answering paragraph 140 of the Complaint, under the header “Seventh
22 Cause of Action”: Defendants do not have sufficient knowledge, or information or
23 belief, to enable Defendants to answer the allegations contained within such
24 paragraph, as stated, and on those grounds deny generally and specifically each and
25 every of the allegations contained therein – and Defendants deny all liability and/or
26 wrongdoing.

27 141. Answering paragraph 141 of the Complaint, under the header “Seventh
28 Cause of Action”: Defendants do not have sufficient knowledge, or information or

1 belief, to enable Defendants to answer the allegations contained within such
 2 paragraph, as stated, and on those grounds deny generally and specifically each and
 3 every of the allegations contained therein – and Defendants deny all liability and/or
 4 wrongdoing.

5 142. Answering paragraph 142 of the Complaint, under the header “Seventh
 6 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 7 belief, to enable Defendants to answer the allegations contained within such
 8 paragraph, as stated, and on those grounds deny generally and specifically each and
 9 every of the allegations contained therein – and Defendants deny all liability and/or
 10 wrongdoing.

11 143. Answering paragraph 143 of the Complaint, under the header “Seventh
 12 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 13 belief, to enable Defendants to answer the allegations contained within such
 14 paragraph, as stated, and on those grounds deny generally and specifically each and
 15 every of the allegations contained therein – and Defendants deny all liability and/or
 16 wrongdoing.

17 144. Answering paragraph 144 of the Complaint, under the header “Eighth
 18 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
 19 and denials contained in the foregoing Answer which are set forth to each and every
 20 allegation contained in paragraphs 1 through 143, inclusive, of the Complaint.

21 145. Answering paragraph 145 of the Complaint, under the header “Eighth
 22 Cause of Action”: Defendants do not have sufficient knowledge, or information or
 23 belief, to enable Defendants to answer the allegations contained within such
 24 paragraph, as stated, and on those grounds deny generally and specifically each and
 25 every of the allegations contained therein – and Defendants deny all liability and/or
 26 wrongdoing.

27 146. Answering paragraph 146 of the Complaint, under the header “Eighth
 28 Cause of Action”: Defendants do not have sufficient knowledge, or information or

1 belief, to enable Defendants to answer the allegations contained within such
2 paragraph, as stated, and on those grounds deny generally and specifically each and
3 every of the allegations contained therein – and Defendants deny all liability and/or
4 wrongdoing.

5 147. Answering paragraph 147 of the Complaint, under the header “Eighth
6 Cause of Action”: Defendants do not have sufficient knowledge, or information or
7 belief, to enable Defendants to answer the allegations contained within such
8 paragraph, as stated, and on those grounds deny generally and specifically each and
9 every of the allegations contained therein – and Defendants deny all liability and/or
10 wrongdoing.

11 148. Answering paragraph 148 of the Complaint, under the header “Ninth
12 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
13 and denials contained in the foregoing Answer which are set forth to each and every
14 allegation contained in paragraphs 1 through 147, inclusive, of the Complaint.

15 149. Answering paragraph 149 of the Complaint, under the header “Ninth
16 Cause of Action”: Defendants do not have sufficient knowledge, or information or
17 belief, to enable Defendants to answer the allegations contained within such
18 paragraph, as stated, and on those grounds deny generally and specifically each and
19 every of the allegations contained therein – and Defendants deny all liability and/or
20 wrongdoing.

21 150. Answering paragraph 150 of the Complaint, under the header “Ninth
22 Cause of Action”: Defendants do not have sufficient knowledge, or information or
23 belief, to enable Defendants to answer the allegations contained within such
24 paragraph, as stated, and on those grounds deny generally and specifically each and
25 every of the allegations contained therein – and Defendants deny all liability and/or
26 wrongdoing.

27 151. Answering paragraph 151 of the Complaint, under the header “Ninth
28 Cause of Action”: Defendants do not have sufficient knowledge, or information or

1 belief, to enable Defendants to answer the allegations contained within such
2 paragraph, as stated, and on those grounds deny generally and specifically each and
3 every of the allegations contained therein – and Defendants deny all liability and/or
4 wrongdoing.

5 152. Answering paragraph 152 of the Complaint, under the header “Ninth
6 Cause of Action”: Defendants do not have sufficient knowledge, or information or
7 belief, to enable Defendants to answer the allegations contained within such
8 paragraph, as stated, and on those grounds deny generally and specifically each and
9 every of the allegations contained therein – and Defendants deny all liability and/or
10 wrongdoing.

11 153. Answering paragraph 153 of the Complaint, under the header “Ninth
12 Cause of Action”: Defendants do not have sufficient knowledge, or information or
13 belief, to enable Defendants to answer the allegations contained within such
14 paragraph, as stated, and on those grounds deny generally and specifically each and
15 every of the allegations contained therein – and Defendants deny all liability and/or
16 wrongdoing.

17 154. Answering paragraph 154 of the Complaint, under the header “Ninth
18 Cause of Action”: Defendants do not have sufficient knowledge, or information or
19 belief, to enable Defendants to answer the allegations contained within such
20 paragraph, as stated, and on those grounds deny generally and specifically each and
21 every of the allegations contained therein – and Defendants deny all liability and/or
22 wrongdoing.

23 155. Answering paragraph 155 of the Complaint, under the header “Ninth
24 Cause of Action”: Defendants do not have sufficient knowledge, or information or
25 belief, to enable Defendants to answer the allegations contained within such
26 paragraph, as stated, and on those grounds deny generally and specifically each and
27 every of the allegations contained therein – and Defendants deny all liability and/or
28 wrongdoing.

1 156. Answering paragraph 156 of the Complaint, under the header “Ninth
2 Cause of Action”: Defendants do not have sufficient knowledge, or information or
3 belief, to enable Defendants to answer the allegations contained within such
4 paragraph, as stated, and on those grounds deny generally and specifically each and
5 every of the allegations contained therein – and Defendants deny all liability and/or
6 wrongdoing.

7 157. Answering paragraph 157 of the Complaint, under the header “Tenth
8 Cause of Action”: Defendants repeat, reiterate, and re-allege all of the admissions
9 and denials contained in the foregoing Answer which are set forth to each and every
10 allegation contained in paragraphs 1 through 156, inclusive, of the Complaint.

11 158. Answering paragraph 158 of the Complaint, under the header “Tenth
12 Cause of Action”: Defendants do not have sufficient knowledge, or information or
13 belief, to enable Defendants to answer the allegations contained within such
14 paragraph, as stated, and on those grounds deny generally and specifically each and
15 every of the allegations contained therein – and Defendants deny all liability and/or
16 wrongdoing.

17 159. Answering paragraph 159 of the Complaint, under the header “Tenth
18 Cause of Action”: Defendants do not have sufficient knowledge, or information or
19 belief, to enable Defendants to answer the allegations contained within such
20 paragraph, as stated, and on those grounds deny generally and specifically each and
21 every of the allegations contained therein – and Defendants deny all liability and/or
22 wrongdoing.

23 160. Answering paragraph 160 of the Complaint, under the header “Tenth
24 Cause of Action”: Defendants do not have sufficient knowledge, or information or
25 belief, to enable Defendants to answer the allegations contained within such
26 paragraph, as stated, and on those grounds deny generally and specifically each and
27 every of the allegations contained therein – and Defendants deny all liability and/or
28 wrongdoing.

1 161. Answering paragraph 161 of the Complaint, under the header “Tenth
2 Cause of Action”: Defendants do not have sufficient knowledge, or information or
3 belief, to enable Defendants to answer the allegations contained within such
4 paragraph, as stated, and on those grounds deny generally and specifically each and
5 every of the allegations contained therein – and Defendants deny all liability and/or
6 wrongdoing.

7 162. Answering paragraph 162 of the Complaint, under the header “Tenth
8 Cause of Action”: Defendants do not have sufficient knowledge, or information or
9 belief, to enable Defendants to answer the allegations contained within such
10 paragraph, as stated, and on those grounds deny generally and specifically each and
11 every of the allegations contained therein – and Defendants deny all liability and/or
12 wrongdoing.

13 163. Answering paragraph 163 of the Complaint, under the header “Tenth
14 Cause of Action”: Defendants do not have sufficient knowledge, or information or
15 belief, to enable Defendants to answer the allegations contained within such
16 paragraph, as stated, and on those grounds deny generally and specifically each and
17 every of the allegations contained therein – and Defendants deny all liability and/or
18 wrongdoing.

19 164. Answering paragraph 164 of the Complaint, under the header “Tenth
20 Cause of Action”: Defendants do not have sufficient knowledge, or information or
21 belief, to enable Defendants to answer the allegations contained within such
22 paragraph, as stated, and on those grounds deny generally and specifically each and
23 every of the allegations contained therein – and Defendants deny all liability and/or
24 wrongdoing.

25 165. Answering paragraph 165 of the Complaint, under the header “Tenth
26 Cause of Action”: Defendants do not have sufficient knowledge, or information or
27 belief, to enable Defendants to answer the allegations contained within such
28 paragraph, as stated, and on those grounds deny generally and specifically each and

1 every of the allegations contained therein – and Defendants deny all liability and/or
2 wrongdoing.

3 166. Answering paragraph 166 of the Complaint, under the header
4 “Eleventh Cause of Action”: Defendants repeat, reiterate, and re-allege all of the
5 admissions and denials contained in the foregoing Answer which are set forth to
6 each and every allegation contained in paragraphs 1 through 165, inclusive, of the
7 Complaint.

8 167. Answering paragraph 167 of the Complaint, under the header
9 “Eleventh Cause of Action”: Defendants do not have sufficient knowledge, or
10 information or belief, to enable Defendants to answer the allegations contained
11 within such paragraph, as stated, and on those grounds deny generally and
12 specifically each and every of the allegations contained therein – and Defendants
13 deny all liability and/or wrongdoing.

14 168. Answering paragraph 168 of the Complaint, under the header
15 “Eleventh Cause of Action”: Defendants do not have sufficient knowledge, or
16 information or belief, to enable Defendants to answer the allegations contained
17 within such paragraph, as stated, and on those grounds deny generally and
18 specifically each and every of the allegations contained therein – and Defendants
19 deny all liability and/or wrongdoing.

20 169. Answering Plaintiffs’ Prayer for relief, Defendants deny all liability to
21 Plaintiffs, including, but not limited to, all liability for any and all damages, an
22 including, but not limited to, compensatory damages; statutory damages; attorneys’
23 fees; costs of any kind; punitive and exemplary damages against Defendants; and/or
24 for any relief of any kind from Defendants to Plaintiffs.

AFFIRMATIVE DEFENSES

1. As separate and affirmative defenses, Defendant alleges as follows¹:

FIRST AFFIRMATIVE DEFENSE

(Failure to State Claim, Statute of Limitations)

2. Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

3. Plaintiffs' Complaint also fails to state a claim against any defendant in this action.

4. Plaintiffs' claims are time-barred by the operative statutes of limitations (including, but not limited to, Cal. Code Civ. Proc. § 335.1).

SECOND AFFIRMATIVE DEFENSE

(Tort Claims Act Violation)

5. This action is barred by the Plaintiffs' failure to comply with the government tort claims presentation requirements, California Government Code § 900, *et seq.*, including, but not limited to, §§ 900, 900.4, 901, 905, 905.2, 910, 911, 911.2, 911.4, 945.4, 946.6, 950.2, and 950.6, to the extent applicable.

6. The Complaint is barred based on Plaintiffs' failure to exhaust administrative remedies prior to filing this lawsuit.

THIRD AFFIRMATIVE DEFENSE

(Waiver, Estoppel, Unclean Hands)

7. Defendants allege that Plaintiffs' action is barred by reason of conduct, actions, and inactions of Plaintiffs which amount to and constitute waiver of any right Plaintiffs may or might have had in reference to the matters and things alleged in the Complaint, or that otherwise estop Plaintiffs from recovery in this action,

¹ For purposes of affirmative defenses, affirmative defenses that reference "Plaintiffs" shall also be construed to apply, wherever feasible, to Plaintiffs' decedent.

1 including, but not limited to, the doctrine of unclean hands.

2 **FOURTH AFFIRMATIVE DEFENSE**

3 **(Failure to Mitigate Damages)**

4 8. Plaintiffs' claims are barred or limited to the extent Plaintiffs failed to
5 mitigate Plaintiffs' injuries or damages, if there were any. Plaintiffs failed to
6 mitigate the damages, if any, which Plaintiffs have sustained, and to exercise
7 reasonable care to avoid the consequences of harms, if any, in that, among other
8 things, Plaintiffs failed to use reasonable diligence in caring for any injuries, failed
9 to use reasonable means to prevent aggravation of any injuries, and any failed to
10 take reasonable precautions to reduce any injuries and damages.

11 **FIFTH AFFIRMATIVE DEFENSE**

12 **(Contributory and/or Comparative Liability)**

13 9. Plaintiffs' claims are barred or limited by Plaintiffs'
14 contributory/comparative negligence or other conduct, acts, or omissions, and to the
15 extent any Plaintiffs suffered any injury or damages, it was the result of Plaintiffs'
16 own negligent or deliberate actions or omissions.

17 10. Plaintiffs' recovery is barred because any injury or damage suffered by
18 Plaintiffs was caused solely by reason of the Plaintiffs' wrongful acts and conduct
19 and the willful resistance to a peace officer in the discharge of their duties. The
20 conduct set forth in the Complaint, if and to the extent it occurred, was privileged
21 and justified and done with a good faith believe that it was correct and no action
22 may be taken against the answering Defendant on account of such conduct.

23 **SIXTH AFFIRMATIVE DEFENSE**

24 **(Public Entity/Employee Immunity for Others' Torts)**

25 11. Plaintiffs' recovery is barred because public entities and employees are
26 immune from liability for any injury caused by the act or omission of another
27 person. Cal. Gov. Code §§ 815 *et seq.*, 820.2 *et seq.*

28 12. The answering Defendants are informed and believe and thereon allege

1 that if Plaintiffs sustained any injury or damages, such injury or damages were
 2 solely caused or contributed to by the wrongful conduct of other entities or persons
 3 other than the answer Defendants. To the extent that Plaintiffs' damages were so
 4 caused, any recovery by Plaintiffs as against the answer Defendants should be
 5 subject to proportionately comparative equitable indemnity/contribution from such
 6 third parties.

7 **SEVENTH AFFIRMATIVE DEFENSE**

8 **(Public Entity/Employee Immunity for Discretionary Acts)**

9 13. There is no liability for any injury or damages, if there were any,
 10 resulting from an exercise of discretion vested in a public employee, whether or not
 11 such discretion as abused. Cal. Gov. Code §§ 815.2, 820.2, 820.4, 820.8, *et seq.*

12 14. Plaintiffs' recovery is barred because public entities and employees are
 13 immune from liability for discharging their mandatory duties with reasonable
 14 diligence.

15 15. A public employee may not be held liable for injuries or damages, if
 16 any, caused by failure to adopt or by adoption of an enactment or by failure to
 17 enforce an enactment and/or law, for an injury caused by their issuance, denial,
 18 suspension or revocation or by their failure or refusal to issue, deny, suspend, or
 19 revoke, any permit, license, certificate, approval, order, or similar authorization,
 20 where they are authorized by enactment to determine whether or not such
 21 authorization should be issued, denied, suspended, or revoked, pursuant to Cal. Gov.
 22 Code §§ 818.2, 818.4, 818.8, 821, and 821.2. Based thereon, answering Defendants
 23 are immune from liability for any injuries claimed by Plaintiffs, herein.

24 16. The answering Defendants are immune for any detriment resulting
 25 from any of its actions or omissions at the time of the incident of which Plaintiffs
 26 complaint pursuant to Cal. Gov. Code §§ 810 *et seq.*, 815 *et seq.*, 820 *et seq.*, and
 27 845 *et seq.*, including, but not limited to, Cal Gov. Code §§ 810, 810.2, 810.4,
 28 810.6, 810.8, 811, 811.2, 811.4, 811.6, 811.8, 820.6, 820.8, 821, 821.2, 821.4,

1 821.6, 821.8, 822.2, 830.5, 830.6, 835.4, 844.6, and Cal. Gov. Code §§ 854, *et seq.*,
 2 including, but not limited to, §§ 845.6, 854.6, 854.8(a)(2), and §§ 855.4, 855.6,
 3 855.8, and 856.4.

4 **EIGHTH AFFIRMATIVE DEFENSE**

5 **(Public Entity Immunity)**

6 17. To the extent that the Complaint attempts to predicate liability upon the
 7 County or any employees thereof for purported negligent in retention, hiring,
 8 employment, training, or supervision of any public employee, such liability is barred
 9 by Cal. Gov. Code §§ 815.2 and 820.2 and *Herndon v. Cnty. of Marin*, 25 Cal. App.
 10 3d 933, 935, 936 (1972), *rev'd on other grounds by Sullivan v. Cnty. of Los Angeles*,
 11 12 Cal. 3d 710 (1974); and by lack of any duty running to any Plaintiffs; by the fact
 12 that any such purported act or omission is governed exclusively by statute and is
 13 outside the purview of any public employees' authority; and by the failure of any
 14 such acts or omissions to the proximate or legal cause of any injury alleged in the
 15 Complaint. *See de Villers v. Cnty. of San Diego*, 156 Cal. App. 4th 238, 251-253,
 16 255-56 (2007).

17 18. The Defendants may not be held liable on a *respondeat superior* theory
 18 for any negligent or wrongful act or omission on the part of any subordinate. Cal.
 19 Gov. Code §§ 844.6, 845.6; Cal. Civ. Code § 2351; *Malloy v. Fong*, 37 Cal. 2d 356,
 20 378-79 (1951); *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978); *Larez v. City of*
 21 *Los Angeles*, 946 F.2d 630, 645-46 (9th Cir. 1991); *cf. City of Canton v. Harris*, 489
 22 U.S. 378, 388-89 (1989); *City of Los Angeles v. Heller*, 475 U.S. 796 (1986).

23 **NINTH AFFIRMATIVE DEFENSE**

24 **(Qualified Immunity & Good Faith Immunity)**

25 19. The County and its agents or officers at all times relevant to this action
 26 acted reasonably and prudently under the circumstances. Defendant therefore
 27 asserts any individual defendants' (that have been or may be named by Plaintiffs)
 28 qualified immunity from liability to the fullest extent applicable.

20. Defendants are immune from liability under the Federal Civil Rights Act because they acted in good faith with an honest and reasonable belief that their actions were necessary and appropriate. Defendants are immune from liability under the Federal Civil Rights Act because a reasonable police officer could believe that their acts and conduct were appropriate. Defendants are immune from liability under the Federal Civil Rights Act because their conduct did not violate clearly established rights. Defendants are also immune from liability under the doctrine of Qualified Immunity.

21. At all relevant times, the County and its agents or officers acted within the scope of discretion, with due care, and good faith fulfillment of responsibilities pursuant to applicable statutes, rules and regulation, within the bounds of reason, and with the good faith belief that their actions comported with all applicable federal and state laws. *Harlow v. Fitzgerald*, 457 U.S. 800 (1982); Cal Gov. Code §§ 815.2, 820.2.

TENTH AFFIRMATIVE DEFENSE

(Assumption of Risk)

22. At the time and place referred to in the Complaint, and before such event, Plaintiffs knew, appreciated, and understood each and every risk involved in placing themselves in the position which Plaintiffs then assumed, and willingly, knowingly, and voluntarily assumed each of such risk, including, but not limited to, the risk of suffering personal bodily injury, lawful deprivation of rights, and/or death.

JURY DEMAND

23. Defendants demand a trial by jury as to each issue triable by jury.

PRAYER FOR RELIEF

WHEREFORE, the answering Defendants pray as follows:

1. That the Complaint be dismissed, with prejudice, and in its entirety;

1 2. That Plaintiffs take nothing by reason of this Complaint and that
2 judgment be entered against Plaintiffs and in favor of Defendants;

3 3. That Defendants be awarded attorneys' fees and costs of this suit and
4 costs of proof; and

5 4. That Defendants be awarded such other relief as the Court deems just.
6

7 DATED: August 23, 2023

LEWIS BRISBOIS BISGAARD & SMITH LLP

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10 By: *Tori L.N. Bakken*
11 TONY M. SAIN
12 TORI L. N. BAKKEN
13 Attorneys for Defendant, COUNTY OF
14 RIVERSIDE, et al.
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FEDERAL COURT PROOF OF SERVICE
Estate of Richard Matus, Jr., et al. v. County of Riverside, et al.
USDC/Central District Case No. 5:23-cv-00506-CAS-SP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On August 23, 2023, I served the following document(s): **ANSWER OF DEFENDANTS TO PLAINTIFFS' COMPLAINT FOR DAMAGES: JURY TRIAL DEMANDED**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Denisse O. Gastelum, SBN 282771
GASTELUM LAW, APC
A PROFESSIONAL CORPORATION
3767 Worsham Ave.
Long Beach, California 90808
Tel: (213) 340-6112
Fax: (213) 402-8622
Email: dgastelum@gastelumfirm.com

Christian Contreras, SBN 330269
THE LAW OFFICES OF
CHRISTIAN CONTRERAS
PROFESSIONAL LAW
CORPORATION
360 E. 2nd St., 8th Floor
Los Angeles, California 90012
Tel: (323) 435-8000
Fax: (323) 597-0101
Email: CC@Contreras-Law.com

The documents were served by the following means:

☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on August 23, 2023, at Los Angeles, California.

/s/ *Curfew F. Wilson*

Curfew F. Wilson